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May 16, 2024

Via Electronic Case Filing
Hon. Arlene R. Lindsay
United States Magistrate Judge
Eastern District of New York
100 Federal Court Plaza
Central Islip, New York 11772

Re: Corrigan v. Town Of Brookhaven et.al. E.D.N.Y. - Civil Action No. 22-cv-4688 (GRB)(ARL) Letter motion to extend discovery

Dear Judge Lindsay,

Aaron C. DePass is currently counsel of record for plaintiffs in the above-referenced action. This letter motion is seeking a 90-day extension of time for the parties to complete discovery, and an extension of related deadlines.

Presently, the parties are in the discovery phase of the litigation, with discovery set to be completed by June 28, 2024, the first step of dispositive motions to be taken by July 19, 2024, a joint proposed pretrial order filed by August 7, 2024, and a final conference on August 8, 2024. Plaintiffs are requesting a 90-day extension of time to complete discovery by September 30, 2024, and an extension of the related deadlines respectively. The reason for this request is that my father passed away the early part of this year. Unfortunately, I was forced to take significant time away from the practice of law out of state during the time leading up to his death and thereafter as I was a primary care giver, and managed affairs after death. Also problematic is that I have been struck with a debilitating medical condition the past month that has only exacerbated matters. I hope to overcome the medical condition within the next two months. As such, at this time I am of the belief that if not all, the vast majority of discovery will be complete by the end of September, 2024. I have conferred with opposing counsel regarding these matters, and have their consent regarding this request.

I thank the Court for Your Honor's consideration in this matter.

Respectfully submitted, /s/ *Aaron C. DePass* 

Cc: All parties via ECF